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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TSAI-LU SHEN, an individual,
Plaintiff,

v.

MICHELLE LACOUR, an individual; DOES I-
X, inclusive; and ROE CORPORATIONS I-X,
inclusive,
Defendants.

MICHELLE LACOUR,
Counterclaimant,

v.

TSAI-LU SHEN,
Counterclaim
Defendant,

MICHELLE LACOUR,
Third-Party Plaintiff,

v.

JAYSON BAYBUTT and PUBCO
REPORTING SOLUTIONS, INC.,
Third-Party Defendants.

Case No: 2:19-CV-01564-JAD-VCF

**STIPULATION TO CONTINUE
HEARING ON PLAINTIFF
TSAI-LU SHEN’S MOTION TO
DISMISS COUNTERCLAIM
PURSUANT TO FRCP 12(b)(1),
FRCP 12(b)(2), FRCP 12(b)(3) AND
12(b)(6) (ECF NO. 81).; MOTION TO
STRIKE COUNTERCLAIM
PURSUANT TO FRCP 12(f)
(ECF NO. 82); AND
MOTION FOR A MORE
DEFINITIVE STATEMENT ON
COUNTERCLAIM PURSUANT TO
FRCP 12(e) (ECF NO. 83)**

ECF No. 93

Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen’s,
 (“Shen”), and Defendant/Counterclaimant Michelle LaCour’s (“Defendant” or “LaCour”)
by and through their counsel of record, hereby stipulate and agree as follows:

1 1. The hearing on Shen's Motions to (1) dismiss all of the claims for relief in
 2 the Counterclaim filed by LaCour, or in the alternative dismiss some of LaCour's claims
 3 pursuant to FRCP 12(b)(1) FRCP 12(b)(2) FRCP 12(b)(3), and FRCP 12(b)(6) (ECF No.
 4 81); (2) strike portions of LaCour's Counterclaim pursuant to FRCP 12(f) the
 5 Counterclaim (ECF No. 82); and (3) to require a more definite statement from LaCour
 6 regarding the Counterclaim, pursuant to FRCP 12(e) (ECF No. 83) scheduled for
 7 Telephonic Motion Hearing on January 28, 2021 at 03:00 PM in LV Courtroom 6D before
 8 Judge Jennifer A. Dorsey shall be continued.

9 2. This Stipulation is based upon the fact that Counsel for Shen is unavailable
 10 to attend the hearing as currently scheduled and will have no access to a landline to call
 11 in, and requests that the hearing be continued until after February 1, 2021 as the Court
 12 may hear the Motions.

13 Respectfully submitted by:
 14 Dated: December 30, 2020

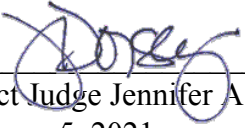
Dated: December 30, 2020

15 /s/ Kimberly P. Stein
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Attorneys for Defendant Michelle LaCour

24 **IT IS SO ORDERED** that the hearing on Shen's Motions to (1) dismiss all of the
 25 claims for relief in the Counterclaim filed by LaCour, or in the alternative dismiss some
 26 of LaCour's claims pursuant to FRCP 12(b)(1) FRCP 12(b)(2) FRCP 12(b)(3), and FRCP
 27 12(b)(6) (ECF No. 81); (2) strike portions of LaCour's Counterclaim pursuant to FRCP
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1 12(f) the Counterclaim (ECF No. 82); and (3) to require a more definite statement from
2 LaCour regarding the Counterclaim, pursuant to FRCP 12(e) (ECF No. 83) scheduled for
3 Telephonic Motion Hearing on January 28, 2021 at 03:00 PM in LV Courtroom 6D before
4 Judge Jennifer A. Dorsey is continued **to 2/2/21 at 2 p.m.**

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7 U.S. District Judge Jennifer A. Dorsey
8 Dated: January 5, 2021
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